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From: drupal_admin@epa.gov [mailto:drupal_admin@epa.gov]

Sent: Tuesday, September 06, 2016 12:32 PM

To: HarborComments <HarborComments@epa.gov>

Subject: Harbor Comments

Submitted on 09/06/2016 3:31PM

Submitted values are:

Your Name: (b) (6)

Your Email: (b) (6)

Your Comments:

I have lived in Oregon all my adult life and most of that time within walking distance of the Willamette River. I have raised my children to celebrate and respect our rivers. The health of our river system depends on our daily choices and longterm investments. The livability of our region depends on a clean and healthy Willamette River that sustains life for all the people, fish and wildlife that call it home.

I am very concerned with inadequate Proposed Cleanup Plan for the Portland Harbor Superfund Site for many reasons. In short it is insufficient, shortsighted and hasn't adequately consulted Tribal Nations. I do not believe it will deliver acceptable protection against ongoing health risks or ensure the river is swimmable or that fish caught in the harbor will be safe to eat.

The final cleanup plan must be protective of human health and the environment.

My concerns about the proposed plan in summary are:

1. There are too many contaminants left in the river. The bulk of the dangerous pollutants are planned to be left in the river bottom and banks.

This does not fulfill the EPA mission to clean and restore water quality and protect against health risks.

2. There is no evidence demonstrating that MNR is effective when contaminants do not break down.

3. There is very little community acceptance and instead much opposition to this weak plan by environmental and community groups. This signals a lack of tax payer support for a poorly drafted proposal that is too sympathetic to industry stakeholders and powerful agency lobbying.

4. This narrowly focused plan does not adequately prevent the flow of contaminants into the Columbia River or the Pacific Ocean. Pushing the problem from one area to another is bad practice and only further exasperates the region's contaminated legacy.

5. Tribal consultation has been minimal and weak. The Tribal Nations should be more enthusiastically and thoroughly engaged. The proposed plan should not be in violation of our longstanding treaties.

6. There is no real plan for the restoration of lost habitat.

7. There is no independent monitoring of air and water quality. I do not trust the EPA to monitor and report to the public on cleanup process.

8. Monitoring of progress and compliance is weak and the timeframe to remedy problems will expose the public to ongoing health risks.

9. There is insufficient concern in the plan for atmospheric release of contaminants during the cleanup process. If this is to be handled by the ODEQ then it should be clearly outlined in the plan.

10. The timeline and cost estimates for the cleanup plan is totally unrealistic when compared to other less complicated sites and smaller project areas. The overall cost of cleanup and timeline should reflect the value of the Willamette Riverr as a central cultural feature in Portland and the larger region, and the ongoing costs of limited access, health impacts and treaty violations.

I urge the EPA to make significant revisions to strengthen the plan to reflect public feedback and the detailed responses of Tribal Nations.

Sincerely,

(b) (6)
Portland, Oregon